1 2	Neel Chatterjee (SBN 173985) nchatterjee@goodwinlaw.com GOODWIN PROCTER LLP	
3	135 Commonwealth Drive Menlo Park, California 94025	
4	Tel.: +1 650 752 3100 Fax.: +1 650 853 1038	
5	Brett Schuman (SBN 189247) bschuman@goodwinlaw.com	
6	Shane Brun (SBN 179079) sbrun@goodwinlaw.com	
7	Rachel M. Walsh (SBN 250568) rwalsh@goodwinlaw.com	
8	Hayes P. Hyde (SBN 308031) hhyde@goodwinlaw.com GOODWIN PROCTER LLP	
9 10	Three Embarcadero Center San Francisco, California 94111 Tel.: +1 415 733 6000	
11	Fax.: +1 415 677 9041	
12	Hong-An Vu (SBN 266268) hvu@goodwinlaw.com GOODWIN PROCTER LLP	
13	601 S. Figueroa Street, 41st Floor Los Angeles, CA 90017	
14	Tel.: +1 213 426 2500 Fax.: +1 213 623 1673	
15 16	Attorneys for Defendant Otto Trucking LLC	
17		DISTRICT COURT CCT OF CALIFORNIA
18		SCO DIVISION
19	Waymo LLC,	Case No. 3:17-cv-00939-WHA
20	Plaintiff,	DEFENDANT OTTO TRUCKING'S ADMINISTRATIVE MOTION TO FILE
21	V.	UNDER SEAL PORTIONS OF ITS MOTION FOR RELIEF FROM
22	Uber Technologies, Inc.; Ottomotto LLC; Otto Trucking LLC,	NONDISPOSITIVE PRETRIAL ORDER RE:WAYMO'S MOTION TO COMPEL OF MAGISTRATE JUDGE (DKT. 881)
23	Defendants.	Courtroom: 8, 19th Floor
24		Judge: Honorable William Alsup Trial Date: October 10, 2017
25		Filed/Lodged Concurrently with:
26		 Declaration of Hong-An Vu; [Proposed] Order;
27		3. Redacted/Unredacted Version of Motion for Relief;4. Proof of Service
28		4. F1001 01 Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC ("Otto Trucking") submits this motion for an order to file under seal exhibits to its Motion for Relief from Nondispositive Pretrial Order re Waymo's Motion to Compel of Magistrate Judge (Dkt. 881) ("Objection"). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following document:

Document	Portions to Be Filed Under Seal
Objection	Highlighted Portions

The highlighted portions of the Objection contain highly confidential, sensitive business information of Otto Trucking relating to terms of Otto Trucking's agreements, corporate structure, and financial information. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. If this information were made public, Otto Trucking's competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking's competitive standing could be significantly harmed.

Otto Trucking's request to seal is narrowly tailored to those portions of the Motion's supporting documents that merit sealing.

Dated: July 17, 2017 Respectfully submitted,

By: /s/ Hong-An Vu Neel Chatterjee nchatterjee@goodwinlaw.com GOODWIN PROCTER LLP

135 Commonwealth Drive Menlo Park, California 94025 Tel.: +1 650 752 3100

Fax.: +1 650 853 1038

Brett Schuman bschuman@goodwinlaw.com Shane Brun sbrun@goodwinlaw.com Rachel M. Walsh rwalsh@goodwinlaw.com Hayes P. Hyde hhyde@goodwinlaw.com

ACTIVE/91867503.2

1 2	GOODWIN PROCTER LLP Three Embarcadero Center San Francisco, California 94111 Tel.: +1 415 733 6000
3	Fax.: +1 415 677 9041
4	Hong-An Vu hvu@goodwinlaw.com GOODWIN PROCTER LLP
5	GOODWIN PROCTER LLP 601 S. Figueroa Street, 41st Floor
6 7	601 S. Figueroa Street, 41st Floor Los Angeles, CA 90017 Tel.: +1 213 426 2500 Fax.: +1 213 623 1673
8	Attorneys for Defendant
9	Otto Trucking LLC
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
2627	
28	
۵۵	ACTIVE 01967502.2

CERTIFICATE OF SERVICE I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 17, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. I certify under penalty of perjury that the foregoing is true and correct. Executed this 17th day of July 2017 in San Francisco, California. /s/ Hong-An Vu Hong-An Vu

ACTIVE/91867503.2